

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**RIO BRAVO PIPELINE CO. LLC (“RIO BRAVO”)**      **DOCKET NO. CP16-455**

**MOTION TO INTERVENE OF  
CITY OF SOUTH PADRE ISLAND, TEXAS**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, 18 CFR §§ 385.212 and 385.214 (2007), the City of South Padre Island, Texas (“City”) hereby moves to intervene in the above-captioned proceeding.

**I.      Background**

On May 5, 2016, Rio Bravo Pipeline Company, LLC (“Rio Bravo”) filed with the commission an Application for Authorization under Section 3(a) of the Natural Gas Act for authority to site, construct, modify, and operate facilities used for the development of a new pipeline system to transport natural gas from the Agua Dulce natural gas hub area to the terminal located in Cameron County, Texas (the “project”) in or adjacent to the corporate limits or extra-territorial jurisdiction of the City of South Padre Island, Texas.

**II.      Motion to Intervene**

**A.      Description of the City**

The City, a Texas municipality incorporated in 1973, is located in Cameron County, Texas along the shores of the Laguna Madre and the Gulf of Mexico. In 2008 , City Ordinance No. 08-08 recorded the city’s population as 5,001. Principal industries in the city include fishing, tourism and recreational

water sports. As a municipality located closely to the proposed project, the city is directly affected. Visitors to the city will pass by the project before arriving to the city, and elements of the project will be visible from the city. As a community dependent on tourist spending, the aesthetic appeal of the surrounding area is economically-vital. City residents employed in the fishing and tourism industries use waters and other natural environments commercially that may be impacted by the project, while other city residents use potentially impacted waters and environments for recreational purposes. The city is located in close proximity to the project site, and subject to potential adverse health and safety impacts, including emissions, dust, noise and light generated by daily operations, as well as technological hazards associated with potential incidents at the project site. The proximity of the project to the city's transportation infrastructure, including the Brazos Santiago Pass, Gulf Intracoastal Waterway, the Gulf of Mexico and Port Isabel Ship Channel and Turning Basin, as well as State Highways 100 and 48 expose the city to potential transportation disruption caused by operations or incidents at the project site. Furthermore, the city is highly-dependent on revenues collected from property, sales taxes, and hotel-motel occupancy tax and any decline in property values or in tourist visits will result in economic harm to the city. In addition to impacts related to the project's location in relation to the city, the city also notes potential adverse impacts by the project on cultural and environmental resources located at or adjacent to the project site, including the potential for injury to the Kemps Ridley Sea Turtle and the Piping Plover, both protected species, and impacts upon the Bahia Grande unit of the Laguna

Atascosa Wildlife Refuge, which houses endangered species such as the Ocelot, Jagurundi, and numerous bird and plant species; and which has also been the site of discoveries of Karankawa Indian artifacts. The city reasonably believes that the project will impact these precious cultural and environmental resources, which are of significance to South Padre Island residents and visitors. Additionally, the City of South Padre Island reserves the right to add or amend elements related to its standing to intervene in this proceeding.

**B. Motion to Intervene**

Based on the above, the city has a direct and substantial interest in the above docket, and may be directly impacted by the outcome of this proceeding. The city cannot be adequately represented by any other party and may be adversely affected or bound without opportunity to present its position unless it is permitted to participate in this matter. Moreover, the city's participation in this proceeding is in the public interest. Accordingly, good cause exists to grant the city's motion to intervene.

**III. Communications**

All correspondence and communications related to this proceeding should be directed to the following individuals whose names and addresses should be placed on the official service list maintained by the Secretary for this proceeding:

Darla A. Jones,  
Interim City Manager,  
City of South Padre Island  
4601 Padre Boulevard

Paul Y. Cunningham, Jr.  
City Attorney,  
City of South Padre Island  
P.O. Box 2729

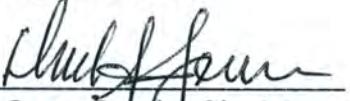
South Padre Island, TX 78597  
Phone: 956-761-8107  
Fax: 956-761-3888  
djones@myspi.org

South Padre Island, TX 78597  
Phone: 956-761-6476  
Fax: 956-761-7812  
lawofficepy@sbglobal.net

**IV. Conclusion**

Wherefore, for the reasons discussed above, the City of South Padre Island, Texas respectfully requests that the Commission grant the city's motion to intervene as a party in the above-captioned proceeding with all of the rights attendant thereto.

Respectfully submitted,

  
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Darla A. Jones, Interim City Manager  
South Padre Island, Texas

Dated: June 7, 2016

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**TEXAS LNG BROWNSVILLE LLC )**

**DOCKET NO. CP16-116**

**MOTION TO INTERVENE OF  
CITY OF SOUTH PADRE ISLAND, TEXAS**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 CFR §§ 385.212 and 385.214 (2007), the City of South Padre Island, Texas ("City") hereby moves to intervene in the above-captioned proceeding.

**I. Background**

On March 30, 2016, Texas LNG Brownsville LLC ("Texas LNG") filed with the commission an Application for Authorization under Section 3(a) of the Natural Gas Act for authority to site, construct, modify, and operate facilities used for the export of natural gas located in Cameron County, Texas (the "project") in or adjacent to the corporate limits or extra-territorial jurisdiction of the City of South Padre Island, Texas.

**II. Motion to Intervene**

**A. Description of the City**

The City, a Texas municipality incorporated in 1973, is located in Cameron County, Texas along the shores of the Laguna Madre and the Gulf of Mexico. In 2008 , City Ordinance No. 08-08 recorded the city's population as 5,001. Principal industries in the city include fishing, tourism and recreational water sports. As a municipality located closely to the proposed project, the city is



directly affected. Visitors to the city will pass by the project before arriving to the city, and elements of the project will be visible from the city. As a community dependent on tourist spending, the aesthetic appeal of the surrounding area is economically-vital. City residents employed in the fishing and tourism industries use waters and other natural environments commercially that may be impacted by the project, while other city residents use potentially impacted waters and environments for recreational purposes. The city is located in close proximity to the project site, and subject to potential adverse health and safety impacts, including emissions, dust, noise and light generated by daily operations, as well as technological hazards associated with potential incidents at the project site. The proximity of the project to the city's transportation infrastructure, including the Brazos Santiago Pass, Gulf Intracoastal Waterway, the Gulf of Mexico and Port Isabel Ship Channel and Turning Basin, as well as State Highways 100 and 48 expose the city to potential transportation disruption caused by operations or incidents at the project site. Furthermore, the city is highly-dependent on revenues collected from property, sales taxes, and hotel-motel occupancy tax and any decline in property values or in tourist visits will result in economic harm to the city. In addition to impacts related to the project's location in relation to the city, the city also notes potential adverse impacts by the project on cultural and environmental resources located at or adjacent to the project site, including the potential for injury to the Kemps Ridley Sea Turtle and the Piping Plover, both protected species, and impacts upon the Bahia Grande unit of the Laguna Atascosa Wildlife Refuge, which houses endangered species such as the Ocelot,



Jagurundi, and numerous bird and plant species; and which has also been the site of discoveries of Karankawa Indian artifacts. The city reasonably believes that the project will impact these precious cultural and environmental resources, which are of significance to South Padre Island residents and visitors. Additionally, the City of South Padre Island reserves the right to add or amend elements related to its standing to intervene in this proceeding.

**B. Motion to Intervene**

Based on the above, the city has a direct and substantial interest in the above docket, and may be directly impacted by the outcome of this proceeding. The city cannot be adequately represented by any other party and may be adversely affected or bound without opportunity to present its position unless it is permitted to participate in this matter. Moreover, the city's participation in this proceeding is in the public interest. Accordingly, good cause exists to grant the city's motion to intervene.

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Interim City Manager,	City Attorney,
City of South Padre Island	City of South Padre Island
4601 Padre Boulevard	P.O. Box 2729
South Padre Island, TX 78597	South Padre Island, TX 78597



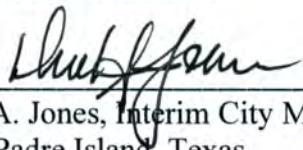
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**IV. Conclusion**

Wherefore, for the reasons discussed above, the City of South Padre Island, Texas respectfully requests that the Commission grant the city's motion to intervene as a party in the above-captioned proceeding with all of the rights attendant thereto.

Respectfully submitted,

  
\_\_\_\_\_  
Darla A. Jones, Interim City Manager  
South Padre Island, Texas

Dated: June 1, 2016



**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**RIO GRANDE LNG LLC)**

**DOCKET NO. CP16-454**

**MOTION TO INTERVENE OF  
CITY OF SOUTH PADRE ISLAND, TEXAS**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 CFR §§ 385.212 and 385.214 (2007), the City of South Padre Island, Texas ("City") hereby moves to intervene in the above-captioned proceeding.

**I. Background**

On May 5, 2016, Rio Grande LNG, LLC ("Rio Grande") filed with the commission an Application for Authorization under Section 3(a) of the Natural Gas Act for authority to site, construct, modify, and operate facilities used for the development of a new natural gas liquefaction terminal located in Cameron County, Texas (the "project") in or adjacent to the corporate limits or extra-territorial jurisdiction of the City of South Padre Island, Texas.

**II. Motion to Intervene**

**A. Description of the City**

The City, a Texas municipality incorporated in 1973, is located in Cameron County, Texas along the shores of the Laguna Madre and the Gulf of Mexico. In 2008 , City Ordinance No. 08-08 recorded the city's population as 5,001. Principal industries in the city include fishing, tourism and recreational

water sports. As a municipality located closely to the proposed project, the city is directly affected. Visitors to the city will pass by the project before arriving to the city, and elements of the project will be visible from the city. As a community dependent on tourist spending, the aesthetic appeal of the surrounding area is economically-vital. City residents employed in the fishing and tourism industries use waters and other natural environments commercially that may be impacted by the project, while other city residents use potentially impacted waters and environments for recreational purposes. The city is located in close proximity to the project site, and subject to potential adverse health and safety impacts, including emissions, dust, noise and light generated by daily operations, as well as technological hazards associated with potential incidents at the project site. The proximity of the project to the city's transportation infrastructure, including the Brazos Santiago Pass, Gulf Intracoastal Waterway, the Gulf of Mexico and Port Isabel Ship Channel and Turning Basin, as well as State Highways 100 and 48 expose the city to potential transportation disruption caused by operations or incidents at the project site. Furthermore, the city is highly-dependent on revenues collected from property, sales taxes, and hotel-motel occupancy tax and any decline in property values or in tourist visits will result in economic harm to the city. In addition to impacts related to the project's location in relation to the city, the city also notes potential adverse impacts by the project on cultural and environmental resources located at or adjacent to the project site, including the potential for injury to the Kemps Ridley Sea Turtle and the Piping Plover, both protected species, and impacts upon the Bahia Grande unit of the Laguna

Atascosa Wildlife Refuge, which houses endangered species such as the Ocelot, Jagurundi, and numerous bird and plant species; and which has also been the site of discoveries of Karankawa Indian artifacts. The city reasonably believes that the project will impact these precious cultural and environmental resources, which are of significance to South Padre Island residents and visitors. Additionally, the City of South Padre Island reserves the right to add or amend elements related to its standing to intervene in this proceeding.

**B. Motion to Intervene**

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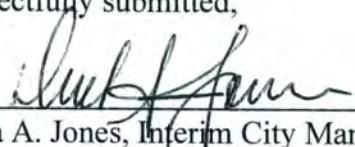
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**IV. Conclusion**

Wherefore, for the reasons discussed above, the City of South Padre Island, Texas respectfully requests that the Commission grant the city's motion to intervene as a party in the above-captioned proceeding with all of the rights attendant thereto.

Respectfully submitted,

  
\_\_\_\_\_  
Darla A. Jones, Interim City Manager  
South Padre Island, Texas

Dated: June 7, 2016

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